

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
AT CHATTANOOGA**

IN THE MATTER OF THE SEARCH OF:

USPS Express Mail Parcel identified
by tracking # EL 570235633 US,
addressed to:

MICHAEL COOPER
113 ALTAMONT AVENUE
DALTON, GA 30720

AFFIDAVIT

I, Jedidiah Hutchison, being duly sworn, hereby depose and say:

1. I am a Postal Inspector with the United States Postal Inspection Service. I have been employed in this capacity since 2010. I am currently assigned to the United States Postal Inspection Service Office in Chattanooga, Tennessee. I am responsible for investigating crimes involving the United States Postal Service ("USPS"), its employees, and its customers. These crimes include but are not limited to employee assaults, mail fraud, mail theft, identity theft, and prohibited mailings including child pornography and illegal narcotics.

2. I am a Law Enforcement Officer under the authority of Title 18 U.S.C. § 3061. As such, I am authorized to make arrests without warrant for offenses made in my presence or if I have reasonable grounds to believe the person has committed or is committing a felony against the United States. I am also authorized under this statute to carry firearms and make seizures of property as provided by law.

3. From my training and experience, I know that the United States Postal Service is frequently used to transport illegal narcotics to areas throughout the United States. I am also aware that the United States Postal Service is used to send the proceeds relating to narcotics distribution back to the narcotics source of supply. I also know that the reason drug traffickers

use the United States Mail to ship controlled substances and their proceeds is because of the speed and protection afforded the United States Mail.

4. Title 21 U.S.C. § 841 makes it an offense for any person to manufacture, distribute, or possess with intent to manufacture or distribute, a controlled substance. Title 21 U.S.C. § 843(b) makes it an offense for any person knowingly or intentionally to use any communication facility in committing or in causing to facilitating the commission of any act or acts constituting a felony under any provisions of Subchapter I or Subchapter II of the Drug Abuse Prevention and Control Act. Title 21, U.S.C. § 846 makes it an offense set out in Title 21.

5. To combat the distribution of illegal narcotics and their proceeds, certain profiling and investigative techniques are utilized by Postal Inspectors. What follows is not meant to set forth all exhaustive investigative knowledge of this case or profiling techniques used, but only those facts necessary in order to establish probable cause.

RELEVANT FACTS

6. On December 29, 2016, due to the circumstances described in Paragraph 8 of this Affidavit, I became suspicious of an Express Mail parcel (hereinafter “the package” or “the parcel”) bearing the unique USPS tracking number EL570235633US and addressed as follows:

**FROM:
DAKOTA WATSON
376 IMPERIAL WAY
DALY CITY, CA 94015**

**TO:
MICHAEL COOPER
113 ALTAMONT AVENUE
DALTON, GA 30720**

7. All Express Mail destined for delivery in Dalton, Georgia, must first travel through the Main Post Office for sorting in Chattanooga, Tennessee. The Express Mail package identified herein, bearing tracking number EL570235633US, traveled through the Main Post Office in Chattanooga, Tennessee. I intercepted the above-mentioned parcel in the Chattanooga

Main Post Office. I have maintained custody and control of the above parcel in the Eastern District of Tennessee since intercepting it.

8. On or about December 16, 2016, I received notification from another Law Enforcement Officer that a resident living at 113 Altamont Ave in Georgia has a criminal history including narcotics offenses and may be involved in drug trafficking. I then identified the above inbound parcel going to this same address. The reasons I believe the above parcel contains narcotics include, but are not limited to the following factors: The parcel was traveling by way of USPS "Express Mail" and did not require signature. Express Mail service is considered a premium class of service due to the speed and expense (\$75.05 in this case) and primarily used by businesses in which an overnight shipment followed by a proof of delivery by way of customer signature would be required. Drug traffickers will pay extra for Express Mail but not require a signature upon delivery. Legitimate packages with a business purpose travelling by Express Mail will usually bear a typed label and a business name. The above mentioned parcel's label is hand-written with no business name. Additionally, this package is coming from Daly City, California. Daly City is located in the greater San Francisco area, a known source area for narcotics within a source state. USPIS refers to California as a "source state" because of the large quantity of parcels containing narcotics that originate from California delivered to various parts of the United States, including Tennessee and Georgia. A records search reveals that the return address listed on this parcel has no resident with the name "Dakota ^{WATSON} ~~Watkins~~" at the return address or "Michael Cooper" at the delivery address. It is common for narcotics traffickers to use fictitious names at legitimate addresses in order to conceal the narcotics sender and intended recipient in order to separate themselves from their shipments. I have identified at least fifteen (15) other packages travelling by way of Express Mail coming from the San Francisco area that

have been delivered to this address in Dalton during 2016. It is common for narcotics traffickers to receive multiple shipments from the same area of Source States.

9. On December 29, 2016, I met with K9 Drug Detector Dog Unit Officer Ben Johnson and his K9 "Mali." K9 Mali conducted an exterior examination of the subject parcel along with three (3) other parcels. I was present when the parcels were presented to K9 Mali by his handler, Officer Johnson. Officer Johnson informed me that K9 Mali demonstrated a positive alert on the above mentioned parcel.

10. I have been advised of the qualifications of the canine handler and his narcotics detector canine. K9 Mali is trained to detect the odor of illegal narcotics including marijuana, cocaine, heroin, and methamphetamine. K9 Mali and Officer Johnson are certified by the North American Police Work Dog Association ("NAPWDA") and the Hamilton County Sheriff's Office as a K9 drug detection team. Within the past six months, K9 Mali and Officer Johnson have completed 80 additional hours of NAPWDA training in multiple fields, including canine drug detection techniques, handling, and handler-dog communication. Additionally, K9 Mali and Officer Johnson engage in a minimum of 16 hours per month of training in drug detection techniques, handling, and handler-dog communication. K9 Mali has been in service for approximately two years, during which time, she has proven reliable in detecting narcotics odor, including the odor of marijuana, cocaine, heroin, and methamphetamine.


11. Based on the facts set forth in this affidavit, I believe there is probable cause to believe that the above parcel contains controlled substances, currency, paraphernalia, or other evidence that relates to trafficking of controlled substances, in violation of Title 21, United States Code, Sections 841(a)(1) (distribution and possession with intent to distribute a controlled

substance) and 843(b) (unlawful use of a communication facility, including the U.S. Mails, to facilitate the distribution of a controlled substance).

12. The subject parcel has been maintained unopened, in my custody pending application for a search warrant.

13. In accordance with 18 U.S.C. § 3103a(b) and Federal Rule of Criminal Procedure 41(f)(3), I request delayed notification of the warrant for thirty days after execution. An additional 30 days will allow law enforcement officers to use additional means to further confirm that the sender and recipient of this package are fictitious and not amenable to notification. Additionally, if the sender and recipient are not fictitious, there is reasonable cause to believe that providing immediate notification may have an adverse result, as defined in 18 U.S.C. § 2705. Providing immediate notice would seriously jeopardize an ongoing investigation by prematurely revealing its existence and giving suspects an opportunity to flee from prosecution, destroy or tamper with evidence, intimidate potential witnesses, notify confederates, and change patterns of behavior.

FURTHER AFFIANT SAYETH NOT.


Jedidiah Hutchison
Postal Inspector
United States Postal Inspection Service

Subscribed and sworn to before me
this 30th day of December, 2016.

A handwritten signature in black ink, appearing to read "Susan K. Lee", written over a horizontal line.

Hon. Susan K. Lee
United States Magistrate Judge